

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**CASCADIA WILDLANDS, and OREGON WILD,**

Plaintiffs,  
vs.

**BUREAU OF LAND MANAGEMENT**, a federal agency,

Defendant,  
and

**SENECA SAWMILL COMPANY**, an Oregon Corporation.

Defendant-Intervenor.

Civil No. 6:20-cv-01395-MK

**STIPULATED MOTION FOR  
EXTENSION OF TIME TO FILE  
REMEDY BRIEFS**

The parties respectfully submit this *Stipulated Motion for Extension of Time to File Supplemental Remedy Briefs to the Interim Findings and Recommendation*.

On June 30, 2021, this Court issued Interim Findings and Recommendation. (Dkt. #35, F&R). This Court requested that parties submit supplemental briefs as to the appropriate remedy given the Court's expected recommendation. F&R at 22. The supplemental briefs would be due 30 days from the entry of the Interim F&R, which is on July 6, 2021.

Attorneys for Intervenor, Lawson Fite and Sara Ghafouri, have competing work obligations and vacation during this timeframe that necessitate the extension. Specifically,

1. Counsel Sara Ghafouri had to prepare responses to an objection in *North Cascades Conservation Council et al. v. United States Forest Service et al.*, No. 2:20-cv-01321-RAJ-BAT, due on July 1, 2021.

2. Counsels Lawson Fite and Sara Ghafouri must prepare a Ninth Circuit *amicus curiae* brief in *Cottonwood Environmental Law Center v. Leanne Marten et al.*, No. 21-35070, due on July 14, 2021.
3. Supervising attorney Lawson Fite is on vacation from June 30 to July 9 and is unavailable on work-related travel from July 13-14.

The parties conferred on June 30, 2021, and Plaintiffs and Federal Defendants do not oppose the motion to extend the briefing schedule. Accordingly, Intervenor requests this Court extend the deadline for the parties' supplemental remedy briefs to July 19, 2021.

Dated this 1st day of July, 2021.

/s/ Sara Ghafouri

Sara Ghafouri, Ore. Bar #111021  
Lawson E. Fite, Ore. Bar #055573  
American Forest Resource Council  
700 N.E. Multnomah, Suite 320  
Portland, Oregon 97232  
Telephone: (503) 222-9505  
Fax: (503) 222-3255  
Email: lfite@amforest.org  
Email: sghafouri@amforest.org

*Attorneys for Defendant-Intervenor*

/s/ Nicholas Cady

Nicholas Cady (OSB #113463)  
P.O. Box 10455  
Eugene, Oregon 97440  
Phone: (541) 434-1463  
nick@cascwild.org

Daniel C. Snyder (OSB #105127)  
B. Parker Jones (OSB #191163)  
Law Offices of Charles M. Tebbutt  
941 Lawrence St.  
Eugene, OR 97401

Phone: (541) 344-3505  
[dan@tebbuttlaw.com](mailto:dan@tebbuttlaw.com) [parker@tebbuttlaw.com](mailto:parker@tebbuttlaw.com)

*Attorneys for Plaintiffs*

/s/ John P. Tustin  
JOHN P. TUSTIN (Texas State Bar No. 24056453)  
Senior Attorney  
Natural Resources Section  
Environment and Natural Resources Division  
United States Department of Justice  
P.O. Box 7611  
Washington, D.C. 20044-7611  
Phone: (202) 305-3022 / Fax: (202) 305-0506  
[john.tustin@usdoj.gov](mailto:john.tustin@usdoj.gov)

*Attorneys for Federal Defendant*

**CERTIFICATE OF SERVICE**

I, Sara Ghafouri, hereby certify that I, on July 1, 2021, I caused the foregoing to be served upon counsel of record through the Court's electronic service system.

Dated this 1st day of July, 2021.

/s/ Sara Ghafouri  
Sara Ghafouri